

**IN THE UNITED STATES DISTRICT COURT  
FOR THE MIDDLE DISTRICT OF TENNESSEE  
AT NASHVILLE**

**NICHOLAS ENNIS, FIREARMS POLICY  
COALITION, INC., and FIREARMS  
POLICY FOUNDATION,**

**Plaintiffs,**

**v.**

**COUNTY OF SUMNER, TENNESSEE;  
ANTHONY HOLT in his official capacity as  
County Executive and County Mayor of  
Sumner County, TN; ROY “SONNY”  
WEATHERFORD in his official capacity as  
Sumner County Sheriff; CHRIS SANFORD  
in his individual and official capacities,  
KYLE MAHANEY in his individual and  
official capacities; JUSTIN DOWNS in his  
individual and official capacities; and  
CARL EDISON in his individual and  
official capacities,**

**Defendants.**

**Civil Action No. 3:20-cv-805**

**Chief Judge Waverly D. Crenshaw  
Mag. Judge Barbara D. Holmes**

**JURY DEMAND**

**FIRST JOINT STATUS REPORT**

Come now Plaintiffs Nicholas Ennis, Firearms Policy Coalition, Inc., and Firearms Policy Foundation (collectively, “Plaintiffs”) and Defendants Sumner County, Anthony Holt, Roy “Sonny” Weatherford, Chris Sanford, Kyle Mahaney, Justin Downs, and Carl Edison (collectively, “Defendants”), by and through the undersigned counsel, and for their First Joint Status Report pursuant to the Court’s Initial Case Management Order (Doc. No. 19), state as follows:

On February 18, 2021, Plaintiffs sent an initial settlement demand to Defendants. On February 19, 2021, Defendants rejected Plaintiffs’ demand and submitted a counter-offer, which remains pending. The parties are currently in the process of exchanging initial written discovery

requests, and continue to work toward completing discovery such that all operative facts are available to facilitate further settlement discussions.

Respectfully submitted:

**Attorneys for Plaintiffs:**

/s/ Raymond DiGuiseppe (with permission)

Raymond DiGuiseppe, CA Bar #228457  
The DiGuiseppe Law Firm, P.C.  
4320 Southport-Supply Road, Suite 300  
Southport, NC 28461  
[law.rmd@gmail.com](mailto:law.rmd@gmail.com)

/s/ Michael Sousa (with permission)

Michael Sousa, CA Bar #229416  
3232 Governor Drive, Suite A  
San Diego, CA 92122  
[msousa@msousalaw.com](mailto:msousa@msousalaw.com)

/s/ Lloyd R. Tatum (with permission)

Lloyd R. Tatum, #11326  
Tatum & Tatum  
P O Box 293  
124 E Main Street  
Henderson, TN 38340  
[lloydtatum1@yahoo.com](mailto:lloydtatum1@yahoo.com)

/s/ Eugene Volokh (with permission)

Eugene Volokh  
385 Charles E. Young Dr. E.  
Los Angeles, CA 90095  
[volokh@law.ucla.edu](mailto:volokh@law.ucla.edu)

**Attorneys for Defendants:**

/s/ Leah May Dennen (with permission)

Leah May Dennen, #12711  
Sumner County Law Director  
Benjamin C. Allen, #35923  
355 North Belvedere Drive, Room 303  
Gallatin, TN 37066  
615-451-6060  
[LeahMay@sumnercountyttn.gov](mailto:LeahMay@sumnercountyttn.gov)  
[Ben@sumnercountyttn.gov](mailto:Ben@sumnercountyttn.gov)

/s/ Thomas B. Russell

Thomas B. Russell, #26011  
Sarah L. Locker, #31994  
GULLETT SANFORD ROBINSON  
& MARTIN PLLC  
150 Third Avenue South, Suite 1700  
Nashville, TN 37201  
615-244-4994  
[trussell@gsrm.com](mailto:trussell@gsrm.com); [slocker@gsrm.com](mailto:slocker@gsrm.com)

### **CERTIFICATE OF SERVICE**

I hereby certify that on the 24<sup>th</sup> day of February, 2021, a copy of the foregoing was filed electronically. Notice of this filing will be sent by operation of the Court's electronic filing system to all parties indicated on the electronic filing receipt. All other parties will be served by regular U.S. Mail. Parties may access this filing through the Court's electronic filing system.

Eugene Volokh  
385 Charles E. Young Dr. E.  
Los Angeles, CA 90095  
[volokh@law.ucla.edu](mailto:volokh@law.ucla.edu)

*Attorney for Plaintiffs*

Lloyd R. Tatum  
Tatum & Tatum  
P O Box 293  
124 E Main Street  
Henderson, TN 38340  
[lloydtatum1@yahoo.com](mailto:lloydtatum1@yahoo.com)

*Attorneys for Plaintiffs*

Michael Sousa  
3232 Governor Drive, Suite A  
San Diego, CA 92122  
[msousa@msousalaw.com](mailto:msousa@msousalaw.com)

*Attorney for Plaintiffs*

Raymond DiGuiseppe  
The DiGuiseppe Law Firm, P.C.  
4320 Southport-Supply Road, Suite 300  
Southport, NC 28461  
[law.rmd@gmail.com](mailto:law.rmd@gmail.com)

*Attorneys for Plaintiffs*

/s/ Thomas B. Russell